

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

ATS TREE SERVICES, LLC,

Plaintiff,

v.

FEDERAL TRADE COMMISSION; LINA M. KHAN, in her official capacity as Chair of the Federal Trade Commission; and REBECCA KELLY SLAUGHTER, ALVARO BEDOYA, ANDREW N. FERGUSON, and MELISSA HOLYOAK, in their official capacities as Commissioners of the FTC,

Defendants.

No. 2:24-cv-01743-KBH

**PLAINTIFF’S UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES**

Pursuant to Section III.C of the Court’s Judicial Policies and Procedures, Plaintiff ATS Tree Services, LLC respectfully requests leave to file a reply brief in support of its Motion for Stay of Effective Date and Preliminary Injunction (Doc. 10) not to exceed 18 pages, for an extension of 8 pages. In support of this request, ATS states as follows:

1. On May 14, 2024, Plaintiff filed a 25-page brief in support of its Motion for Stay of Effective Date and Preliminary Injunction. Doc. 11.
2. On May 23, Defendants informed ATS that they intended to seek a 10-page extension for their brief opposing the Motion for Stay of Effective Date and Preliminary Injunction and requested ATS’s consent. On that same day, ATS responded that it did not oppose the request.
3. On May 24, Defendants filed their Motion for Leave to File Excess Pages (Doc. 17), which this Court granted on May 28. Doc. 18.
4. On June 4, Defendants filed their 35-page opposition brief. Doc. 22.

5. Since the opposition was filed, 5 amicus briefs opposing ATS's motion and supporting Defendants have been filed (Docs. 36–40), and a motion for leave to file a sixth amicus brief opposing ATS's motion was filed on June 14 (Doc. 43).

6. Although ATS is still working on its reply brief, which must be filed by June 25 (Doc. 15), due to the excess pages afforded to Defendants and the amicus briefs, it believes it needs excess pages over this Court's 10-page limit for reply briefs.

7. On June 14, ATS emailed Defendants to request an 8-page extension, and Defendants provided their consent on the same day.

For these reasons, ATS submits that good cause exists for a page limit extension of 8 pages, for a total of 18 pages for its reply brief in support of its Motion for Stay of Effective Date and Preliminary Injunction.

DATED: June 17, 2024.

Respectfully submitted,

s/ Sean Radomski  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2024, I electronically filed the foregoing with the Clerk of the United States District Court for the Eastern District of Pennsylvania using the CM/ECF system, which sent notifications of such filing to all registered CM/ECF users.

DATED: June 17, 2024.

/s/ Sean Radomski  
SEAN RADOMSKI